

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

EDGEWOOD HIGH SCHOOL OF THE
SACRED HEART, INC.,

Case No. 3:21-cv-00118-wmc

Plaintiff,

v.

CITY OF MADISON, WISCONSIN, *et al.*,

Defendants.

DECLARATION OF JONATHAN R. INGRISANO

I, Jonathan R. Ingrisano, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Edgewood High School of the Sacred Heart, Inc. (“EHS”) in the above captioned matter. I make this declaration on personal knowledge and on my knowledge and familiarity with the records in this case. Publicly available materials online were individually confirmed and obtained by me.

2. Attached hereto as Exhibit 1 is a true and correct copy of Deposition Exhibit 39, The Planning Division Staff Report dated March 24, 2014, marked at the deposition of Matthew Tucker taken April 29, 2022.

3. Attached hereto as Exhibit 2 is a true and correct copy of Deposition Exhibit 38, a City of Madison Site Plan Verification marked at the deposition of Matthew Tucker taken April 29, 2022.

4. Attached hereto as Exhibit 3 is a true and correct copy of publicly available online media reports relating to the Goodman Softball Practice Facility.

5. Attached hereto as Exhibit 4 is a true and correct copy of publicly available online media reports relating to the UW Natatorium.

6. Attached hereto as Exhibit 5 is a true and correct copy of publicly available online descriptions by the University of Wisconsin of the Nielsen Tennis Stadium.

7. Attached hereto as Exhibit 6 is a true and correct copy of publicly available online descriptions by the University of Wisconsin of their facilities at the Near West Fields.

8. Attached hereto as Exhibit 7 is a true and correct copy of Deposition Exhibit 21, a City of Madison Legistar print out of Legislative Information marked at the deposition of Tag Evers taken on April 28, 2022.

9. Attached hereto as Exhibit 8 is a true and correct copy of a publicly available online media report by the Capital Times dated August 1, 2019.

10. Attached hereto as Exhibit 9 is a true and correct copy of Deposition Exhibit 19, a City of Madison Legistar print out of Legislative Information marked at the deposition of Tag Evers taken on April 28, 2022.marked at the deposition of Tag Evers taken on April 28, 2022.

11. Attached hereto as Exhibit 10 is a true and correct copy of Deposition Exhibit 28, a September 4, 2019 Wisconsin State Journal article marked at the deposition of Tag Evers taken on April 28, 2022.

12. Attached hereto as Exhibit 11 is a true and correct copy of Deposition Exhibit 75, marked at the deposition of Michael Elliott taken on May 10, 2022.

13. Attached hereto as Exhibit 12 is a true and correct copy of Deposition Exhibit 41, marked at the deposition of Deposition Exhibit 41, marked at the deposition of Matthew Tucker taken on April 29, 2022.

14. Attached hereto as Exhibit 13 is a true and correct copy of Deposition Exhibit 23, marked at the deposition of Tag Evers taken on April 28, 2022.

15. The August 6, 2019 Common Council meeting was recorded and is available through the City's Legislative Information Center "(Legistar)". A link to the August 6, 2019 Common Council Meeting is here:

<https://media.cityofmadison.com/mediasite/Showcase/madison-city-channel/Presentation/e19aad4be91f479bb2215824d66012061d/Channel/d29c91089bda40e7bb0fba20311ff0755f>.

16. The September 3, 2019 Common Council meeting was recorded and is available through the City's Legislative Information Center "(Legistar)". The September 3, 2019 meeting was recorded. A link to the September 3, 2021 Common Council Meeting is here:

<https://media.cityofmadison.com/mediasite/Showcase/madison-city-channel/Presentation/29dd0d8cbe0941ee91b6cf303e83e2b51d/Channel/d29c91089bda40e7bb0fba20311ff0755f>.

17. The August 26, 2019 Common Council meeting was recorded and is available through the City's Legislative Information Center "(Legistar)". The August 26, 2019 meeting was recorded. A link to the August 26, 2019 Plan Commission meeting is here.

<https://media.cityofmadison.com/Mediasite/Showcase/madison-city-channel/Presentation/0ce00975e667466791dd493dc6d162d91d>.

[SIGNATURE ON NEXT PAGE]

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of June, 2022.



Jonathan R. Ingrisano

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